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November 22, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

VIA COURIER

Mr. Anthony Dale  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Room 6-C43  
Washington, D.C. 20554

**Re: Application by Bell Atlantic-New York for Authorization to  
Provide In-Region InterLATA Services in New York CC  
Docket 99-295**

**Written Ex Parte Presentation by e.spire Communications, Inc.**

Dear Mr. Dale:

On behalf of e.spire Communications, Inc. ("e.spire"), and as per your request, I am writing to provide additional information to supplement that provided in yesterday's telephone conference, which included James C. Falvey, Vice President--Regulatory Affairs, network engineer, Robert Girard, and the undersigned, in addition to yourself and Whitey Thayer.

As e.spire indicated yesterday, Bell Atlantic-New York's ("Bell Atlantic" or "BA-NY") assertions in response<sup>1</sup> to the provisioning problems detailed by e.spire in its initial

<sup>1</sup> See Reply Comments of Bell Atlantic In Support of Application by Bell Atlantic-New York for Authorization to Provide In-Region InterLATA Services in New York at Reply App. A, Vol. 2, Tab 1 Lacouture/Troy Declaration, ¶¶ 20-23 (Nov. 8, 1999) ("Lacouture/Troy Reply Declaration").

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comments,<sup>2</sup> and further expounded upon in a written *ex parte* presentation in this proceeding<sup>3</sup> are simply false. Bell Atlantic asserts that e.spire did not provide “the necessary interconnection trunking forecasts until June 1999” and did not follow “the process established by the New York Public Service Commission.”<sup>4</sup> Bell Atlantic is simply incorrect. As e.spire’s *Ex Parte* indicates, e.spire provided Bell Atlantic with its Initial Forecast on May 4, 1999. Moreover, Bell Atlantic’s vague assertions that e.spire did not comply with “the process established by the New York Commission” fall flat. e.spire provided its forecast to Bell Atlantic in full compliance with the terms of its interconnection agreement, without objection by BA-NY. The intervals referenced in the Canny Reply Affidavit are irrelevant to the analysis in the present case.

Also incorrect is Bell Atlantic’s statement that it “provisioned the interconnection trunks by the second week of August 1999 – only one week after e.spire’s hoped for switch turn up date.” Reply, para. 22. First, the negotiated date for trunk installation was July 2, to provide for a month of testing prior to switch turn-up on August 2. Bell Atlantic was approximately six weeks late on the July 2 deadline. It was only by compressing all other testing requirements into one week instead of four that e.spire was able to turn up its switch by August 24. In addition, BA-NY merely turned up a small portion of the trunks e.spire initially ordered. e.spire substantially reduced its trunking expectations (although not its requirements, as initially forecasted) at Bell Atlantic’s request once Bell Atlantic made clear to e.spire that it could not meet e.spire’s original request for interconnection trunks.<sup>5</sup> It was these reduced minimal trunks that BA-NY delivered six weeks late.

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<sup>2</sup> See Joint Comments of e.spire Communications, Inc. and Net2000 Communications Services, Inc., CC Docket 99-295 (Oct. 19, 1999) (“Comments”).

<sup>3</sup> See Written *Ex Parte* Presentation by e.spire Communications, Inc., CC Docket 99-295, (Nov. 9, 1999) (“*Ex Parte*”).

<sup>4</sup> Lacouture/Troy Reply Affidavit at ¶ 21.

<sup>5</sup> Attached is an e-mail from Robert Girard to Mary Maher of Bell Atlantic. The parties initially agreed to turn up all of e.spire’s trunks by July 2. When it became clear that Bell Atlantic would not meet this deadline, e.spire, at Bell’s request, reduced the number of trunks it expected to have turned up by Bell Atlantic. The attached e-mail from Robert Girard to Mary Maher of Bell Atlantic– which itself incorporates a separate e-mail from Barbara Jordan of e.spire – states:

The minimum trunk requirements are as follows:

- one T1 to/from every tandem (both local and access)
- one T1 to/from every end-office
- all ancillary trunks (OS/DA, CC, BLVI, E911).

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At bottom, the record is clear that serious Bell Atlantic provisioning problems substantially delayed the turn-up of e.spire's New York switch, despite the fact that e.spire provided Bell Atlantic with an initial trunk plan, and worked diligently with Bell Atlantic to turn up e.spire's switch within the time frame agreed upon by the companies pursuant to the interval negotiated.

The New York Commission on November 5 issued an order addressing, among other things, negotiated intervals for new trunk groups.<sup>6</sup> While e.spire applauds the New York Commission for attempting to bring some certainty to what is, as demonstrated by e.spire's experience, an uncertain and frustrating process, e.spire submits that the adoption of a definition of "negotiated" and of outer limits for negotiated intervals are not relevant here. The meaning of "negotiated" as contained in both the P.S.C. 914 Tariff,<sup>7</sup> and parties' interconnection agreements is that the parties literally negotiate an interval. e.spire and Bell Atlantic negotiated a July 2 interval which, as previously explained, BA-NY failed to meet. Indeed, Bell Atlantic did not indicate any confusion regarding its obligation, pursuant to the parties' agreement, to provide e.spire with trunk groups by the negotiated interval of July 2. Therefore, while the adoption of the November Order may provide assistance to CLECs who, in the future, are unable to negotiate appropriate intervals for themselves, it could not apply to e.spire's case, where the interval was negotiated by the parties several months prior to the Commission's order.

The Commission's Order also has not made BA-NY any more eager to meet its simple contractual trunk delivery deadlines. BA-NY is contractually committed to meet e.spire's forecasts which it has had since May. Yet as of this date, BA-NY continues to refuse to commit to any schedule to fill e.spire's trunking requirements for 4Q99 and into the year 2000. Nowhere in BA-NY's Reply Comments does it discuss or defend its ongoing delinquency in this regard. BA-NY trunking delays are an ongoing, endemic problem that require substantial new resources, personnel, or process modification in order to be rectified.

If you have any questions with regard to this letter or the attached materials, please do not hesitate to contact me at 202/887-1248. In addition, please feel free to contact Jim

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Accordingly, it was only these "dumbed down" requirements that BA-NY met, and those were only met six weeks after the July 2 deadline.

<sup>6</sup> See *Order Establishing Additional Inter-Carrier Service Quality Guidelines*, NYPSC Case 97-C-0139 (Nov. 5, 1999) ("November C2C Order"). The Order adopted a definition of the term negotiated and set forth "outer limits for negotiated intervals for new trunk groups, and incorporated the intervals and definition of "negotiated" into the Carrier Guidelines.

<sup>7</sup> New York Telephone P.S.C. No. 914, Network Interconnection Services Regulations, Rates and Charges ("914 Tariff").

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Falvey at 301/617-4298. Thank you for your time and consideration. Notice of this written *ex parte* presentation will be filed today with the Commission Secretary.

Respectfully submitted,

A handwritten signature in black ink, reading "Ross A. Buntrock". The signature is written in a cursive, flowing style with a large, prominent "R" and "B".

Ross A. Buntrock

Attachments

cc: FCC Staff at oral *ex parte*  
James C. Falvey  
Robert Girard  
Dee May, Bell Atlantic  
Magalie Salas (2 copies)

**ATTACHMENT**

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## **Ruiz, Christina S.**

**From:** Buntrock, Ross A.  
**Sent:** Monday, November 22, 1999 3:55 PM  
**To:** Ruiz, Christina S.  
**Subject:** FW: E-Mail Concerning Minimal Requirements

Attached is Robert's e-mail. We may need to attach a note explaining what it represents. (An e-mail from Robert attaching an e-mail from Barbara.)

Robert Girard  
06/09/99 02:28 PM

To: mary.j.maher@bellatlantic.com, "David Visser"  
<david.visser@bellatlantic.COM>, "Donnett Barnett"  
<donnett.a.barnett@bellatlantic.COM>, "Kenneth Johnson"  
<kenneth.w.johnson@bellatlantic.COM>  
cc: Richard Giddings/ACSI@ACSI, Kim Bois/ACSI@ACSI, Stephen Goodwin/ACSI@ACSI,  
George Wong/ACSI@ACSI, Barbara Jordan/ACSI@ACSI, Charles  
Douglas/ACSI@ACSI, Donald Heimall/ACSI@ACSI, John Windall/ACSI@ACSI, Tom  
Harmon/ACSI@ACSI  
Subject: NY\_Trunk Plan\_Minimum Requirements

Mary:

I have attached our latest trunk plan (that was sent out from Barbara Jordan to some of you on this distribution list back on 6/3):

BARBARA JORDAN  
06/03/99 04:38 PM

To: mary.j.maher@bellatlantic.com, John Windall/ACSI@ACSI  
cc: donnett.a.barnett@bellatlantic.com, Robert Girard/ACSI@ACSI, Charles  
Douglas/ACSI@ACSI, Mark Vesper/ACSI@ACSI  
Subject: e.spire NY Forecast

Mary-

Attached you will find the updated forecast for e.spire's NY switch. Please feel free to give me a call if you have any questions.

Thanks, Barbara (See attached file: e.spire New York Trunk Forecast (5-0).xls)

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The minimum trunk requirements are as follows:

- one T1 to/from every tandem (both local and access)
- one T1 to/from every end-office
- all ancillary trunks (OS/DA, CC, BLVI, E911)

Then during Call Through Testing the remaining T1s within each trunk group can be built-out.

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The schedule for this minimum trunking requirement is per my "New York Interconnection Schedule" that I have been issuing. Let me summarize:  
E37: (Minimum) Trunks turn-up and tested; between 6/21 to 6/23.  
GC: (Minimum) Trunks turn-up and tested; between 6/24 to 6/25.  
WP: (Minimum) Trunks turn-up and tested; 6/28 to 6/29.  
Then during the month of July we can turnup all the remaining T1s.

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We currently have scheduled additional testing resources on our side to meet this need.

Hence, I would like to have confirmation from BA during our conference call tomorrow, that these dates can be met.

Sincerely,  
Robert Girard  
703-386-2140

PS. I will update the schedule that I kept issuing for the past couple of weeks by COB today for discussion during our conference call tomorrow.

**Bell Atlantic**  
Telecom Industry Services

**CLEC and Wireless Interconnection Trunk Forecast**  
(Local Access Groups)

**Attachment #1**

Carrier Name :	e.spire Communications	Forecast Issue Date:	6/3/99
Issued By:	Barbara Jordan	Reach Number:	703-386-2222

LATA:	132
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								CURRENT YEAR TRUNK REQUIREMENTS Year 1999			
ACTL / POI	TSC	BELL ATLANTIC SWITCH CLLI	TO	DS	Carrier SWITCH CLLI	INTERFACE TYPE	56 KB or 64 Clear Channel	Trks In-Svc as of Fcst Issue Date	1Q FCST	2Q FCST	3Q FCST
Garden City	tbd	DRPKNYDP03T	E	-7	NYCENYCPDC0	DS1	64	0	0	0	600
E37th	tbd	NYCKNYWM24T	E	-7	NYCENYCPDC0	DS1	64	0	0	600	720
E37th	tbd	NYCMNY3723T	E	-7	NYCENYCPDC0	DS1	64	0	0	600	720
E37th	tbd	NYCMNY1306T	E	-7	NYCENYCPDC0	DS1	64	0	0	624	720
White Plains	tbd	WHPLNYWP06T	E	-7	NYCENYCPDC0	DS1	64	0	0	480	600
E37th	tbd	NYCKNYWM12T	E	-7	NYCENYCPDC0	DS1	64	0	0	24	0
E37th	tbd	NYCMNY3706T	E	-7	NYCENYCPDC0	DS1	64	0	0	24	0
Garden City	tbd	DRPKNYDP03T	BA	7-	NYCENYCPDC0	DS1	64	0	0	0	240
E37th	tbd	NYCKNYWM24T	BA	7-	NYCENYCPDC0	DS1	64	0	0	240	216
E37th	tbd	NYCMNY3723T	BA	7-	NYCENYCPDC0	DS1	64	0	0	240	216
E37th	tbd	NYCMNY1306T	BA	7-	NYCENYCPDC0	DS1	64	0	0	240	216
White Plains	tbd	WHPLNYWP06T	BA	7-	NYCENYCPDC0	DS1	64	0	0	240	216
E37th	tbd	BRWDNYBW01T	BA	7-	NYCENYCPDC0	DS1	64	0	0	240	216
Garden City	tbd	GRCYNYGC02T	BA	7-	NYCENYCPDC0	DS1	64	0	0	240	216
E37th	tbd	NYCMNY3706T	2W	77	NYCENYCPDC0	DS1	64	0	0	144	96
E37th	tbd	NYCKNYWM12T	2W	77	NYCENYCPDC0	DS1	64	0	0	96	96
White Plains	tbd	WHPLNYWP06T	2W	77	NYCENYCPDC0	DS1	64	0	0	96	96
E37th	tbd	NYCMNYBW21T	2W	77	NYCENYCPDC0	DS1	64	0	0	24	0



Carrier Name :	e.spire Communications	Forecast Issue Date:	6/3/99
Issued By:	Barbara Jordan	Reach Number:	703-386-2222

LATA:	132
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ACTL / POI	TSC	BELL ATLANTIC SWITCH CLLI	TO	DS	Carrier SWITCH CLLI	INTERFACE TYPE	56 KB or 64 Clear Channel	4Q FCST
Garden City	tbd	DRPKNYDP03T	E	-7	NYCENYCPDC0	DS1	64	600
E37th	tbd	NYCKNYWM24T	E	-7	NYCENYCPDC0	DS1	64	720
E37th	tbd	NYCMNY3723T	E	-7	NYCENYCPDC0	DS1	64	720
E37th	tbd	NYCMNY1306T	E	-7	NYCENYCPDC0	DS1	64	600
White Plains	tbd	WHPLNYWP06T	E	-7	NYCENYCPDC0	DS1	64	576
E37th	tbd	NYCKNYWM12T	E	-7	NYCENYCPDC0	DS1	64	0
E37th	tbd	NYCMNY3706T	E	-7	NYCENYCPDC0	DS1	64	0
Garden City	tbd	DRPKNYDP03T	BA	7-	NYCENYCPDC0	DS1	64	240
E37th	tbd	NYCKNYWM24T	BA	7-	NYCENYCPDC0	DS1	64	216
E37th	tbd	NYCMNY3723T	BA	7-	NYCENYCPDC0	DS1	64	216
E37th	tbd	NYCMNY1306T	BA	7-	NYCENYCPDC0	DS1	64	216
White Plains	tbd	WHPLNYWP06T	BA	7-	NYCENYCPDC0	DS1	64	216
E37th	tbd	BRWDNYBW01T	BA	7-	NYCENYCPDC0	DS1	64	216
Garden City	tbd	GRCYNYGC02T	BA	7-	NYCENYCPDC0	DS1	64	216
E37th	tbd	NYCMNY3706T	2W	77	NYCENYCPDC0	DS1	64	96
E37th	tbd	NYCKNYWM12T	2W	77	NYCENYCPDC0	DS1	64	96
White Plains	tbd	WHPLNYWP06T	2W	77	NYCENYCPDC0	DS1	64	96
E37th	tbd	NYCMNYBW21T	2W	77	NYCENYCPDC0	DS1	64	0

**Bell Atlantic**  
Telecom Industry Services

**CLEC and Wireless Interconnection Trunk Forecast**  
(Local Access Groups)

Attachment #1

Carrier Name :	e.spire Communications	Forecast Issue Date:	6/3/99
Issued By:	Barbara Jordan	Reach Number:	703-386-2222

LATA:	132
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								TRUNK FORECAST REQUIREMENTS Year 2000			
ACTL / POI	TSC	BELL ATLANTIC SWITCH CLLI	TO	DS	Carrier SWITCH CLLI	INTERFACE TYPE	56 KB or 64 Clear Channel	1Q	2Q	3Q	4Q
Garden City	tbd	DRPKNYDP03T	E	-7	NYCENYCPDC0	DS1	64	240	192	192	192
E37th	tbd	NYCKNYWM24T	E	-7	NYCENYCPDC0	DS1	64	240	192	192	192
E37th	tbd	NYCMNY3723T	E	-7	NYCENYCPDC0	DS1	64	240	192	192	192
E37th	tbd	NYCMNY1306T	E	-7	NYCENYCPDC0	DS1	64	240	192	192	192
White Plains	tbd	WHPLNYWP06T	E	-7	NYCENYCPDC0	DS1	64	240	192	192	192
E37th	tbd	NYCKNYWM12T	E	-7	NYCENYCPDC0	DS1	64	0	0	0	0
E37th	tbd	NYCMNY3706T	E	-7	NYCENYCPDC0	DS1	64	0	0	0	0
Garden City	tbd	DRPKNYDP03T	BA	7-	NYCENYCPDC0	DS1	64	96	96	24	24
E37th	tbd	NYCKNYWM24T	BA	7-	NYCENYCPDC0	DS1	64	96	96	24	24
E37th	tbd	NYCMNY3723T	BA	7-	NYCENYCPDC0	DS1	64	96	96	24	24
E37th	tbd	NYCMNY1306T	BA	7-	NYCENYCPDC0	DS1	64	96	96	24	24
White Plains	tbd	WHPLNYWP06T	BA	7-	NYCENYCPDC0	DS1	64	96	96	24	24
E37th	tbd	BRWDNYBW01T	BA	7-	NYCENYCPDC0	DS1	64	96	96	24	24
Garden City	tbd	GRCYNYGC02T	BA	7-	NYCENYCPDC0	DS1	64	96	96	24	24
E37th	tbd	NYCMNY3706T	2W	77	NYCENYCPDC0	DS1	64	48	24	24	24
E37th	tbd	NYCKNYWM12T	2W	77	NYCENYCPDC0	DS1	64	48	24	24	24
White Plains	tbd	WHPLNYWP06T	2W	77	NYCENYCPDC0	DS1	64	48	24	24	24
E37th	tbd	NYCMNYBW21T	2W	77	NYCENYCPDC0	DS1	64	0	0	0	0

<b>Carrier Name :</b>	<b>e.spire</b> Communications	<b>Forecast Issue Date:</b>	<b>6/3/99</b>
<b>Issued By:</b>	<b>Barbara Jordan</b>	<b>Reach Number:</b>	<b>703-386-2222</b>

<b>LATA:</b>	<b>132</b>
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								<b>TRUNK FORECAST REQUIREMENTS</b>
<b>ACTL / POI</b>	<b>TSC</b>	<b>BELL ATLANTIC SWITCH CLLI</b>	<b>TO</b>	<b>DS</b>	<b>Carrier SWITCH CLLI</b>	<b>INTERFACE TYPE</b>	<b>56 KB or 64 Clear Channel</b>	<b>Totals (Combined 1999 &amp; 2000)</b>
Garden City	tbd	DRPKNYDP03T	E	-7	NYCENYCPDC0	DS1	64	2016
E37th	tbd	NYCKNYWM24T	E	-7	NYCENYCPDC0	DS1	64	2856
E37th	tbd	NYCMNY3723T	E	-7	NYCENYCPDC0	DS1	64	2856
E37th	tbd	NYCMNY1306T	E	-7	NYCENYCPDC0	DS1	64	2760
White Plains	tbd	WHPLNYWP06T	E	-7	NYCENYCPDC0	DS1	64	2472
E37th	tbd	NYCKNYWM12T	E	-7	NYCENYCPDC0	DS1	64	24
E37th	tbd	NYCMNY3706T	E	-7	NYCENYCPDC0	DS1	64	24
Garden City	tbd	DRPKNYDP03T	BA	7-	NYCENYCPDC0	DS1	64	720
E37th	tbd	NYCKNYWM24T	BA	7-	NYCENYCPDC0	DS1	64	912
E37th	tbd	NYCMNY3723T	BA	7-	NYCENYCPDC0	DS1	64	912
E37th	tbd	NYCMNY1306T	BA	7-	NYCENYCPDC0	DS1	64	912
White Plains	tbd	WHPLNYWP06T	BA	7-	NYCENYCPDC0	DS1	64	912
E37th	tbd	BRWDNYBW01T	BA	7-	NYCENYCPDC0	DS1	64	912
Garden City	tbd	GRCYNYGC02T	BA	7-	NYCENYCPDC0	DS1	64	912
E37th	tbd	NYCMNY3706T	2W	77	NYCENYCPDC0	DS1	64	456
E37th	tbd	NYCKNYWM12T	2W	77	NYCENYCPDC0	DS1	64	408
White Plains	tbd	WHPLNYWP06T	2W	77	NYCENYCPDC0	DS1	64	408
E37th	tbd	NYCMNYBW21T	2W	77	NYCENYCPDC0	DS1	64	24

**Bell Atlantic**  
Telecom Industry Services

**CLEC and Wireless Interconnection Trunk Forecast**  
(Local Access Groups)

**Attachment #1**

<b>Carrier Name :</b>	<b>e.spire</b> Communications	<b>Forecast Issue Date:</b>	<b>6/3/99</b>
<b>Issued By:</b>	<b>Barbara Jordan</b>	<b>Reach Number:</b>	<b>703-386-2222</b>

<b>LATA:</b>	<b>132</b>
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ACTL / POI	TSC	BELL ATLANTIC SWITCH CLLI	TO	DS	Carrier SWITCH CLLI	INTERFACE TYPE	56 KB or 64 Clear Channel	REMARKS
Garden City	tbd	DRPKNYDP03T	E	-7	NYCENYCPDC0	DS1	64	local - NPA 516, not available until 9/1 (bell to e.spire)
E37th	tbd	NYCKNYWM24T	E	-7	NYCENYCPDC0	DS1	64	local - NPA 718, 347 (bell to e.spire)
E37th	tbd	NYCMNY3723T	E	-7	NYCENYCPDC0	DS1	64	local - NPA 212, 646 (bell to e.spire)
E37th	tbd	NYCMNY1306T	E	-7	NYCENYCPDC0	DS1	64	local - NPA 917 (bell to e.spire)
White Plains	tbd	WHPLNYWP06T	E	-7	NYCENYCPDC0	DS1	64	local - NPA 914 (bell to e.spire)
E37th	tbd	NYCKNYWM12T	E	-7	NYCENYCPDC0	DS1	64	local - 718 miscellaneous traffic (bell to e.spire)
E37th	tbd	NYCMNY3706T	E	-7	NYCENYCPDC0	DS1	64	local - 212 & 917 miscellaneous traffic (bell to e.spire)
Garden City	tbd	DRPKNYDP03T	BA	7-	NYCENYCPDC0	DS1	64	local - NPA 516, not available until 9/1 (e.spire to bell)
E37th	tbd	NYCKNYWM24T	BA	7-	NYCENYCPDC0	DS1	64	local - NPA 718, 347 (e.spire to bell)
E37th	tbd	NYCMNY3723T	BA	7-	NYCENYCPDC0	DS1	64	local - NPA 212, 646 (e.spire to bell)
E37th	tbd	NYCMNY1306T	BA	7-	NYCENYCPDC0	DS1	64	local - NPA 917 (e.spire to bell)
White Plains	tbd	WHPLNYWP06T	BA	7-	NYCENYCPDC0	DS1	64	local - NPA 914 (e.spire to bell)
E37th	tbd	BRWDNYBW01T	BA	7-	NYCENYCPDC0	DS1	64	local - NPA 516
Garden City	tbd	GRCYNYGC02T	BA	7-	NYCENYCPDC0	DS1	64	local - NPA 516
E37th	tbd	NYCMNY3706T	2W	77	NYCENYCPDC0	DS1	64	IXC - NPA 212, 646
E37th	tbd	NYCKNYWM12T	2W	77	NYCENYCPDC0	DS1	64	IXC - NPA 718, 347
White Plains	tbd	WHPLNYWP06T	2W	77	NYCENYCPDC0	DS1	64	IXC - NPA 914
E37th	tbd	NYCMNYBW21T	2W	77	NYCENYCPDC0	DS1	64	IXC - NPA 917